

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

FILED

SEP 30 2021 *AM*

THOMAS G. BRUTON
CLERK, U.S. DISTRICT COURT

UNITED STATES OF AMERICA,

v.

MARTIN A. CROSSLEY,
DEFENDANT.

Case No. 20 CR 369

JUDGE MARTHA M. PACOLD

DEFENDANT CROSSLEY'S MOTION TO EXPAND TIME TO FILE
MOTIONS FOR ACQUITTAL AND FOR NEW TRIAL

NOW COMES DEFENDANT Martin A. Crossley ("Defendant") pro se, and requests this Honorable Court allow him 90 additional days to file a motion for acquittal and a motion for new trial pursuant to both Federal Rules of Criminal Procedure 29 and 33. In addition, Defendant requests the Court appoint a new attorney to represent him in these motions and at sentencing. In support thereof, Defendant states as follows:

(1). On September 17, 2021, Defendant was convicted in this Court by a jury. The Court set sentencing for February 2022.

(2). Defendant wishes to file a Motion for Acquittal notwithstanding the verdict and a Motion for New Trial pursuant to Fed. R. Crim. P. 33. Although the motion for new trial is due within 14 days of the jury verdict, Defendant requests the Court allow him

ninety (90) days to file both motions. This will allow ample time for production of the trial transcripts, exhibits and all court orders for Defendant and attorney review.

(3). In addition, Defendant's counsel informed him that she will have trials through February 2022, and due to timing concerns, and potential conflicts between counsel and defendant, Mr. Crossley requests that the Court appoint a new attorney to represent the Defendant in the filing of these motions and at sentencing.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'M. Crossley', with a long horizontal flourish extending to the right.

Martin A. Crossley
Defendant
#45294-424
Metropolitan Correctional Center
71 W. Van Buren St.
Chicago, IL 60605

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v.

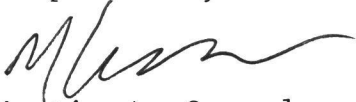
MARTIN A. CROSSLEY,
DEFENDANT.

Case No. 20 CR 369
JUDGE MARTHA M. PACOLD

NOTICE OF FILING

PLEASE TAKE NOTICE that on September 22, 2021, Defendant Martin A. Crossley filed a letter addressed to Hon. Martha M. Pacold, District Judge in the above captioned case, seeking additional time to file a Motion for Acquittal pursuant to Federal Rule of Criminal Procedure 29 and additional time to file a Motion for New Trial pursuant to Federal Rule of Criminal Procedure 33. The letter and Notice of Filing was deposited into the MCC Chicago Legal Mail System and with first class postage prepaid, addressed to the Clerk of the U.S. District Court for the Northern District of Illinois, 219 S. Dearborn St., Chicago, IL 60604.

Respectfully submitted,



Martin A. Crossley
Defendant
#45294-424
Metropolitan Correctional Center
71 W. Van Buren St.
Chicago, IL 60605

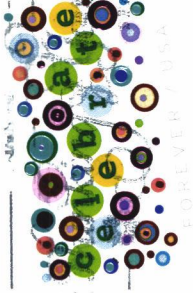
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LEGAL MAIL

Clerk of the U.S. District Court
For the Northern District of Illinois
219 S. Dearborn St.
Chicago, IL 60604

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METROPOLITAN CORRECTIONAL CENTER
71 W. VAN BUREN ST., CHICAGO, IL 60605

The enclosed letter was processed through sorting and packing procedures for forwarding to you.
This letter has neither been opened nor inspected.

SEP 23 2021

If the writer raises a question or problem over which this facility has jurisdiction, you may wish to return the material for further information or clarification. If the writer encloses correspondence forwarding to another addressee, please return the enclosure to the above address.

